Message

From: Culpepper, Linda [linda.culpepper@ncdenr.gov]
Sent: 3/1/2018 9:43:31 PM
To: Allenbach, Becky [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=fd8d7185973c44268441863f02a769d1-Allenbach, Becky]; Kemker, Carol [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=765ad99166db4233bd15febf6e9917b3-Kemker, Carol]; Mitchell, Ken [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=e49335e2f5a64cbfa97c39cbf1faff2b-Mitchell, Kenneth]; Banister, Beverly [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=1d7573525c894f5dbfc19abd6a7fda91-Banister, Beverly]; barkas.jennifer@epa.gov
Subject: Fwd: [External] Chemours - Spent Carbonate Data and Results

Sent from my iPhone

Begin forwarded message:

Resent-From: <SRS0=6w0G=FX=chemours.com=christel.e.compton@securence.com>
From: "Compton, Christel E" <CHRISTEL.E.COMPTON@chemours.com>
Date: March 1, 2018 at 4:21:54 PM EST
To: "trent.allen@ncdenr.gov" <trent.allen@ncdenr.gov>, "Culpepper, Linda" <linda.culpepper@ncdenr.gov>, "Ghiold, Joe" <joe.ghiold@ncdenr.gov>, "Bill.Lane@ncdenr.gov" <Bill.Lane@ncdenr.gov>
Cc: "Rumsey, Allison B." <Allison.Rumsey@arnoldporter.com>, "Gross, Joel M." <Joel.Gross@apks.com>, "Boelter, Karl J" <Karl.J.Boelter@chemours.com>, "Mcgaughy, Ellis H" <Ellis.H.McGaughy@chemours.com>, "Long, Brian D" <Brian.D.Long@chemours.com>
Subject: [External] Chemours - Spent Carbonate Data and Results

Trent -

As addressed in Chemours' February 26, 2018 response to the DEQ NOV dated February 12, 2018, Chemours has been conducting wide-ranging examinations of the Fayetteville Works site in an effort to understand all potential sources of HFPO Dimer Acid in environmental media resulting from the facility's operations. As part of that ongoing effort, we wanted to provide DEQ with recently-available information concerning the handling of spent carbonate waste at the facility, including (i) Chemours ongoing effort to ascertain whether prior handling of those materials could be a source of soil and groundwater HFPO Dimer Acid contamination at the facility, and (ii) a related release potentially involving HFPO Dimer Acid. The following narrative sets forth the relevant facts and circumstances, which remain under investigation by Chemours:

- <!--[if !supportLists]--><!--[endif]-->By way of background, the agitated bed reactor process in the Vinyl Ether North and South facilities produces a spent carbonate material as waste. This spent carbonate is not a regulated compound. Historically, this spent carbonate was placed in bags which were then put in two containers/ dumpsters located on-site, one on the north side of the

IXM/Nafion ditch and one on the south side of the IXM/Nafion ditch. Both containers have fitted flexible plastic coverings.

- <!--[if !supportLists]--><!--[endif]-->In the past, when the containers were full, the spent carbonate material was taken off-site to the Sampson County Subtitle D landfill and disposed of as non-hazardous waste.

- <!--[if !supportLists]--><!--[endif]-->Each year, as required by Sampson County, the facility has tested the spent carbonate material as part of the annual certification. In 2018, the facility added HFPO Dimer Acid to the list of compounds tested. On February 19, 2018, the facility received test results which indicated that the spent carbonate material contained 3,700 ppm HFPO Dimer Acid.

- <!--[if !supportLists]--><!--[endif]-->In light of these results, and the possibility that materials could have leaked from the two containers to surrounding soils, the facility took samples of the surrounding soils for testing on February 21, 2018 and sent those samples to Test America. Results are expected shortly and will be shared with DEQ as soon as we receive them. The facility also excavated soils from the area between the concrete pad the containers were on and the IXM/Nafion ditch, and placed those materials in a third container at the facility and covered it with plastic.

- <!--[if !supportLists]--><!--[endif]-->Yesterday, February 28, 2018, at approximately 4:00 pm, as the third container was being lifted for relocation purposes, the rain water that was on top of the plastic covering rolled towards a corner of the container, falling under the plastic in a corner of the container. Facility personnel noticed the water then exiting the corner of the container and onto the asphalt and into adjacent rocks and soil. The facility excavated approximately a foot of soil and rocks to capture the released liquid (approximately 1/2 gallon), and placed the material in the third container. Based on visual inspection, the release never reached the IXM/Nafion ditch. At this time, the facility does not have an estimate of the amount of HFPO Dimer Acid, if any, that may have been released.

- <!--[if !supportLists]--><!--[endif]-->All three containers have now been placed either in indoor areas not susceptible to rain or within secondary containment. In particular, following the sample results, one of the two spent carbonate storage containers was moved away from the IXM/Nafion ditch to a covered building (the previous flammable warehouse) and the second container was moved away from the IXM/Nafion ditch area and placed within secondary containment, while the facility evaluates disposal options. The third container containing the excavated soils has also been placed in an enclosed building. The facility has been informed by the Sampson Country landfill that it can no longer accept any Chemours material containing HFPO Dimer Acid and Chemours is therefore evaluating other disposal options.

- <!--[if !supportLists]--><!--[endif]-->Since receiving the February 19th test results, Chemours has been considering whether the materials in the first two containers may have been contributing to the higher levels of HFPO Dimer Acid observed

during rain events at Outfall 002. The pending soil sampling results will further inform this consideration. Stephen Shoemaker from Chemours noted this potential source during the meeting with DEQ's Division of Site Remediation and the Office of the Attorney General on February 21, 2018.

- <!--[if !supportLists]--><!--[endif]-->During the DEQ's Division of Air Quality's inspection of the facility on February 28, 2018, the Chemours team notified the inspector about the sampling results indicating that the spent carbonate material contains HFPO Dimer Acid and Chemours agreed to provide this written notification to DEQ, in advance of receiving the pending soil sample results.

In addition to the foregoing, the facility has, in light of the recent high test results discussed above, already made process changes to the agitated bed reactor process in an effort to reduce the levels of HFPO Dimer Acid in the spent carbonate. Testing results on the spent carbonate from the modified process received today show HFPO Dimer Acid concentrations of 290 – 2,100 ppm while running PPVE from VEN, and 0.027 – 0.139 ppm while running PMVE and PEVE range from VES. Consistent with the Company's commitment to keep DEQ fully informed about all potential sources of HFPO Dimer Acid at the Fayetteville site, Chemours is making this initial report regarding the HFPO Dimer Acid in the spent carbonate and the release of material possibly containing HFPO Dimer Acid. In making this report, however, we would also note that (i) this voluntary report is not required by any applicable permit or regulation, and (ii) to the extent any HFPO Dimer Acid was released, it did not result in any exceedance of any reportable quantity, but (iii) in the interests of cooperation and transparency, the Company is nevertheless providing this report giving DEQ's on-going focus on the handling of HFPO Dimer Acid at the facility.

We will provide DEQ with further information as it becomes available, including any test results. If you have any questions or request additional information, we would be glad to schedule a phone call.

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